To Whom it May Concern:

We would like to submit our group's responses for your GMRS service comment request...

First, as far as age requirements for a GMRS license... Due to the fact that current license eligibility requires one to be an adult, everyone in a family is licensed including children. Every child has a dependent or is part of a family until they become an adult. Our group does not see any reason for changing the age requirement that currently exists, to include those under 18. A child cannot be held legally responsible and/or fined and this will cause enforcement issues.

Second, in regard to changing the licensing to "by rule", you may remove the administrative burden of licensing but will be adding the possible additional burden of enforcement issues with abuse and identification. This is an issue that should be investigated. Everyone in our group laments the current cost for a family GMRS license based on current economics, however having some type of cost or license keeps individuals from abusing the service... with possible fines and/or license revocation. Having a 10 year license span will conform the service to match other licensed services and reduce burden quickly without any immediate effects on the service or major changes in abuse or enforcement actions. However, an issue not observed in the report with "by rule" licensing is how repeaters are to be identified without call signs.

Third, the narrowband 12.5 khz standard... this would be adventageous since all Part 95 equipment is also being converted. The method mentioned in the report will not add any burden to anyone other than current GMRS licensees with equipment and by not immediately requiring current licensees to convert, they will have time to obtain, adapt and adopt the new technology. However it is noted that no more efficiency in spectrum channel availability would be present because there already exists a 12.5 khz frequency step between FRS and GMRS channels. However, narrowband will improve GMRS and FRS channel adjacent-channel interference as some wide-band equipment receives from or causes interference to current NarrowBand FRS radios. This requirement will also allow both services to have a common bandwidth scheme which should also be made mandatory in the current MURS service.

Fourth, we would like to mention a few suggestions. We agree that GPS data can be positive to the GMRS service and that no scrambling and plain language used for analog communications. However we ask why open-platform digital communications such as P25 not be permitted? Digital open-source communications is the future of 2-way. With all Commercial Business and Public Safety radio heading toward open-source digital technology, we ask why not plan for advancements that would keep from having to revise rules again in the near future?

Fifth - if licensing is continued... Most in our group believe that the Family Radio Service should be

completely separated from the GMRS service by equipment certification and service separation so that Part 90 FRS equipment should only include GMRS channels for listening and not transmitting. If GMRS is to remain licensed, why not bring up the equipment specifications for GMRS to meet Part 95 and leave FRS for Part 90? There would be less of a burden to re-manufacture and provide narrowband GMRS equipment and technologies and current equipment would currently be on the market to meet the new 12.5 standard, immediately available for GMRS licensees for the conversion. Moving GMRS equipment certification to Part 95 would also allow for a quicker migration to narrowband technologies by users and more consumer product availability and there would be less burden on manufacturers to re-design and produce GMRS-specific products.

Sixth, TPO or ERP? Mobile and Base users would benefit with TPO rather than ERP. Many manufacturers under or over-estimate their gain figures, and gain measurements change based on where an antenna is mounted on a vehicle. Using TPO calculations for mobile operation makes sense. Most of us believe RF Power limits should be placed on FRS service units but not on GMRS other than a 50 watt TPO. This allows the service to be used on farms, in parks, when hiking and large acerages and land tracts. Otherwise the signal would be no better than a cellular phone in many areas. This service would have no advantage over CB or MURS.

Finally, with regards to repeaters: They are a benefit that are also found in Australia's UHF CB service. We feel it would be a detriment to remove them from the service. They improve and increase coverage and communications and can be a major asset in providing local area communications, especially in emergencies where telephone and cellular networks are damaged or unavailable such as after Hurricane Katrina. The current requirements allow for licensees to use all channels and setup repeaters without specific channel coordination, an important factor necessary when responding to an emergency. No one can predict when or where the incident will occur. Other radio services only have repeaters licensed at a particular site at a certain height and area with limited units and they do not always happen to cover incidents and/or have the quantity of personnel and radios on the license required for the scale of the incident. Communities and Response teams can setup Mobile units using GMRS repeaters and equipment anywhere in the USA at a moments notice and hand out portables under an organizations license! Even Amateur Radio cannot do this due to repeater coordination/interference issues and the inability to have non-licensed persons use Amateur radio equipment without a license. Ham radio is also limited in personnel due to educational technical proficiency licensing requirements. Also, since 9/11, there has been increased public interest in emergency training and response groups would be assisted greatly with GMRS capabilities that would allow for group licenses. Current groups utilize GMRS in 2 ways; Grandfathered group licenses where people fall under a group's license similar to LMR, or all volunteers have to pay to have their individual license. (Not only do volunteers offer their experience and time, but also have to pay for a license to assist and train!!!) The later of these 2 ways has been the only permitable scheme since the early 80s when organizational licensing was discontinued to keep out commercial interests and

use. We feel that group licenses are beneficial on GMRS because anyone who volunteers with an organization or agency would be operating under their license and even a child can operate a 2-way radio. However, to solve the possible issue of commercialization of the service when providing for group licensing, we request business use of the GMRS service be banned, except for grandfathered commercial licenses, if there are any remaining. With the expansion of cellular and other wireless technologies the last decade, most individuals have alternative means for conducting business. This would solve the commercial use of GMRS while allowing response groups such as Counties and Response Teams to have their own licenses and caches of radio equipment available so they can better provide their services.

This sums up our issues and suggestions and also raises a lot of issues that must be considered for the GMRS service. We hope the right decisions are made on your behalf so that we can continue to provide communications for the community. Thank you for your time.